

1 MCGREGOR W. SCOTT  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant United States Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States

6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$59,620.00 IN U.S.  
CURRENCY,  
15 Defendant.  
16

2:20-MC-00146-TLN-KJN

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Trey  
18 Suy Lay ("Lay"), by and through their respective counsel, as follows:

19 1. On or about March 23, 2020, claimant Lay filed a claim in the administrative forfeiture  
20 proceedings with the Drug Enforcement Administration with respect to the Approximately \$59,620.00  
21 in U.S. Currency (hereafter "defendant currency"), which was seized on January 17, 2020.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person  
24 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than  
25 the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture  
26 proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
3 the parties. That deadline was June 19, 2020.

4 4. By Stipulation and Order filed June 15, 2020, the parties stipulated to extend to August  
5 18, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 5. By Stipulation and Order filed August 17, 2020, the parties stipulated to extend to October  
9 19, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
11 forfeiture.

12 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
13 to December 18, 2020, the time in which the United States is required to file a civil complaint for  
14 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
15 currency is subject to forfeiture.

16 7. Accordingly, the parties agree that the deadline by which the United States shall be  
17 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
18 alleging that the defendant currency is subject to forfeiture shall be extended to December 18, 2020.

19 Dated: 10/15/2020

MCGREGOR W. SCOTT  
United States Attorney

21 /s/ Kevin C. Khasigian  
22 KEVIN C. KHASIGIAN  
Assistant United States Attorney

24 Dated: 10/15/2020

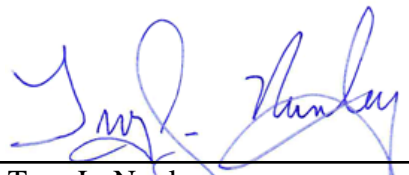
25 /s/ Isaac Safier  
ISAAC SAFIER  
Attorney for Trey Suy Lay  
(As authorized via email)

26 ///

27 ///

IT IS SO ORDERED.

Dated: October 15, 2020

---

Troy L. Nunley  
United States District Judge